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**IN THE UNITED STATES DISTRICT COURT  
FOR THE STATE OF NEVADA**

PARADISE HARBOR PLACE TRUST,  
Plaintiff,

vs.

BANK OF AMERICA, N.A., a national  
association; and DOE individuals I through XX;  
and ROE Corporations I through XX,  
Defendants.

Case No.: 2:22-cv-00313-JCM-EJY

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO RESPOND TO  
COMPLAINT  
(FIRST REQUEST)**

Paradise Harbor Place Trust (**Trust**) and Bank of America, N.A. (**BANA**) stipulate that BANA shall have through **June 27, 2022**, to file its response to the Trust's complaint. The failure of BANA to previously file its response to the Trust's complaint is a result of excusable neglect since BANA and the Trust are seriously exploring settlement options following this court's order denying the Trust's motions for a temporary restraining order and injunctive relief. ECF No. 16. Good cause also exists to grant the requested extension so the parties can continue to explore settlement options. Settlement includes this matter as well as other related quiet title matters in both in this court and in the state district court.

This is the parties' first request for an extension of this deadline and is not intended to cause any delay or prejudice to any party. Rather, it is intended as a firm date for the parties to either

resolve their dispute or move forward with this matter. The parties do not, at this time, request the court's assistance in mediating this matter

DATED this 26<sup>th</sup> day of May, 2022.

<b>AKERMAN LLP</b>	<b>ROGER P. CROTEAU &amp; ASSOCIATES, LTD</b>
<u>/s/ Scott R. Lachman</u> MELANIE D. MORGAN, ESQ. Nevada Bar No. 8215 SCOTT R. LACHMAN, ESQ. Nevada Bar No. 12016 1635 Village Center Circle, Suite 200 Las Vegas, NV 89134	<u>/s/ Christopher L. Benner</u> ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 CHRISTOPHER L. BENNER, ESQ. Nevada Bar No. 8963 2810 W. Charleston Boulevard, Suite 75 Las Vegas, NV 89102
<i>Attorneys for Bank of America, N.A.</i>	<i>Attorneys for Paradise Harbor Place Trust</i>

IT IS SO ORDERED.

  
UNITED STATES MAGISTRATE JUDGE

DATED: May 26, 2022

akerman